

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN,** :  
**LOSARTAN, and IRBESARTAN** : **MDL No. 19-2875 (RBK/KW)**  
**PRODUCTS LIABILITY LITIGATION** :  
:   
**This Order Relates to all Cases** :

**SPECIAL MASTER ORDER NO. 20**

During the May 3, 2021 Case Management Conference, counsel for Plaintiffs and the ZHP Defendants were directed to report by May 7, 2021 concerning Plaintiffs' requests for additional discovery set forth at pages 24 through 26 of Plaintiffs' April 27, 2021 Agenda Letter (Doc 1189). The parties timely complied with this directive, submitting separate reports that evidenced significant progress in relation to the discovery requests. (*See* Docs 1228 and 1229.) In accordance with the status reports, the ZHP Defendants will be directed to provide the data and information they have agreed to produce by May 21, 2021. Counsel shall be prepared to address the unresolved matters identified below at the May 12, 2021 discovery conference.

**NOW, THEREFORE, this 10<sup>th</sup> Day of May, 2021, IT IS HEREBY  
ORDERED THAT:**

1. No later than **May 21, 2021**, the ZHP Defendants shall produce the responsive and non-privileged parts of the custodial files for: (a) Jinsheng LIN; (b) Tianpei HUANG; (c) Wangwei CHEN; and (d) Dan LI. Also by **May 21, 2021**, the ZHP Defendants shall review their ESI collection and, if necessary, supplement their production for the following persons: (a) Guojon FANG; (b) Peng LIU; (c) Wei WANG; (d) Wenquan ZHU; (e) Wenbin CHEN; (f) Peng WANG; (g) Wenling ZHANG; (h) Jucai GE; (i) Min LI; (j) Peng DONG; (k) Lihong LIN; and (l) Yanfeng LIU.
2. No later than **May 21, 2021**, the ZHP Defendants shall run the following search terms across all custodians and report the results for:
  - a. “Zhejiang Second Pharma”; b. “CN103613558A”; c. “Impurity K”;
  - d. “NALCO”; e. “Hypochlorite”; f. “TC-201729”.
3. No later than **May 17, 2021**, the ZHP Defendants shall produce any responsive, non-privileged documents related to tab 3, row 54 of ZHP01391683.
4. No later than **May 21, 2021**, the ZHP Defendants shall produce any responsive, non-privilege documents concerning Valsartan impurity testing performed at or around March of 2017 for impurities found in Valsartan at 2.9, 4.4, and 5.5 min (see ZHP01838590 and ZHP02333049).

5. No later than **May 21, 2021**, the ZHP Defendants shall produce all responsive and non-privileged documents, including personnel files if necessary, associated with broken company issued cell phones and/or laptop computers for Eric GU and Min LI, including the date of occurrence and when and how the device was replaced, and location and status of the broken device.
6. No later than **May 21, 2021**, the ZHP Defendants shall produce any additional responsive and non-privileged emails, meeting minutes, and calendar invites related to the meetings Min LI attended with Baohua CHEN concerning the discovery of NDMA in ZHP sartans and the QC department meetings organized or attended by Quiangming LI.
7. No later than **May 21, 2021**, the ZHP Defendants shall produce any additional responsive and non-privileged documents related to the March 12, 2018 testing investigation of valsartan API Batch No. C55-18-053M, including but not limited to all GC-MS testing data and cGMP documentation associated with the investigation, as well as any additional responsive and non-privileged documents relating to the batch testing referenced in PRINSTON0075797.
8. At the **May 12, 2021** discovery conference, the parties shall be prepared to address the following matters:

- a. the custodial file for Xiaofang (Maggie) Kong;
- b. unredacted copies of ZHP01838590 and ZHP02333049 with  
working document hyperlinks;
- c. litigation hold letters sent to all custodians including records  
demonstrating what devices were subject to the litigation hold for  
each custodian;
- d. records identifying the process by which the collection of devices  
and data was carried out pursuant to the litigation holds, including  
when performed and by whom;
- e. records and documentation associated with Min Li's meeting with  
"multi-national companies" where the decision was made by ZHP  
to limit its investigation of unknown peaks smaller than 20.

s/ Thomas I. Vanaskie  
Hon. Thomas I. Vanaskie (Ret.)  
Special Master